



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

FEB 05 2016

**CERTIFIED MAIL #7009 1680 0000 7648 7924**  
**RETURN RECEIPT REQUESTED**

REPLY TO THE ATTENTION OF:

Mr. Nate Stevenson  
Environmental Program Manager  
Winpak Heat Seal Corporation  
1821 Riverway Drive  
Pekin, Illinois 61554

Re: Request for Information  
ILR000146126

Dear Mr. Stevenson:

By this letter, the U.S. Environmental Protection Agency requests information under Section 3007 of the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. § 6927. Section 3007 authorizes the Administrator of EPA to require you to submit certain information.

This request requires Winpak Heat Seal Corporation (Winpak or you) to submit certain information relating to the generation, treatment, storage, and/or disposal of hazardous waste at Winpak's facility located at 1821 Riverway Drive in Pekin, Illinois (the Facility). EPA is requiring this information to determine Winpak's compliance with RCRA Section 3005 and the Standards Applicable to Generators of Hazardous Waste set forth at 40 CFR Part 262. The enclosure specifies the information you must submit. You must submit this information within 30 calendar days of receiving this request to the United States Environmental Protection Agency, Attention: Daniel Chachakis, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

You may, under 40 CFR Part 2, Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). EPA will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 CFR Part 2, Subpart B. You must make any request for confidentiality when you submit the information since any information not so identified may be made available to the public without further notice.

Winpak must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading, or incomplete, the signatory should notify EPA. Knowingly providing false information in response to this request may be actionable under 18 U.S.C. §§ 1001 and 1341. EPA may use the requested information in an administrative, civil, or

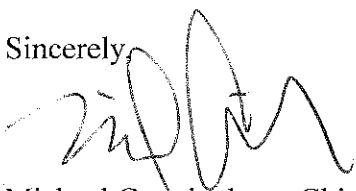
criminal action.

This request is not subject to the Paperwork Reduction Act, U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject Winpak to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Daniel Chachakis, of my staff, at (312) 886-9871 or [chachakis.daniel@epa.gov](mailto:chachakis.daniel@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Cunningham", written over a horizontal line.

Michael Cunningham, Chief  
Compliance Section 1

Enclosure

cc: Todd Marvel, Illinois EPA, [todd.marvel@illinois.gov](mailto:todd.marvel@illinois.gov)

## REQUEST FOR INFORMATION

**Instructions:** You must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request for Information to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

### Requests

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified.
2. Provide a copy of the initial Notification of RCRA Subtitle C Activity form (EPA Form 8700-12) and copies of any subsequent notification forms submitted to IEPA or EPA.
3. For the period beginning January 1, 2011 through the date of receipt of this request, provide copies of all Annual Manifest reports for the Facility.
4. For the period beginning January 1, 2011 through the date of receipt of this request, provide copies of all Biennial Hazardous Waste reports for the Facility.
5. For the period beginning January 1, 2011 through the date of receipt of this request, identify the quantity, by weight, of hazardous waste generated at the Facility each month.
6. Provide a map or diagram of the Facility. Identify and label all areas where hazardous wastes are generated or stored, including such areas as the ink mixing room, the solvent waste area, the sample storage area, the printing press area, and the plate room.
7. Identify all processes at the Facility that generate hazardous waste, and provide the North American Industry Classification System (NAICS) code associated with each process.
8. Identify by name and Chemical Abstracts Service (CAS) Registry Number all solvents used in printing operations at the Facility, including solvents used in the preparation or mixing of ink and also solvents used in cleanup. Provide a copy of the safety data sheet, or the equivalent, for each solvent used at the Facility.
9. List all hazardous waste streams generated at the Facility. For each hazardous waste stream identified, describe the nature of the hazardous waste, the process that generated the hazardous waste, and identify the applicable RCRA hazardous waste code(s).
10. Provide copies of all documents describing Winpak's policies and procedures for the storage of materials containing mixtures of ink and/or solvent in the sample storage area.
11. Provide a current inventory of the sample storage area. For each container in the sample storage area, please include the following information:
  - a. The composition of the material in the container.
  - b. The amount, by weight or volume, of material in the container.
  - c. The date the material was placed in the sample storage area.

- d. The reason(s) why storage of the material in the sample storage area is necessary. If it is determined that storage of any material is no longer necessary, provide the reason for making such determination and the date when Winkpak should have disposed of the material.
  - e. The scheduled or expected disposal date for the material.
  - f. A determination of whether Winkpak anticipates that it will dispose of the material as a solid waste or as a hazardous waste. If Winkpak anticipates disposing of the material as a hazardous waste, please provide, at a minimum, the projected RCRA hazardous waste code.
12. Provide a description of Winkpak's procedures for handling and storing spent solvent in the "dirty solvent" tank prior to reclamation in the solvent recycling system. Include an explanation of how spent solvent is conveyed to the dirty solvent tank (e.g., by pipe from the process, transported in drums from other areas of the facility, etc.) and also Winkpak ensures that spent solvent is not stored for more than 90 days in the "dirty solvent" tank.
13. Provide the following certification by a responsible corporate officer:
- a. I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of documents. Based on my review of all relevant documents and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.